

**EXHIBIT A**

**Derek C. Chen**

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**From:** Laurie\_Cuaresma@wawd.uscourts.gov  
**Sent:** Wednesday, August 30, 2017 2:46 PM  
**To:** LaHoma Walker  
**Cc:** Derek C. Chen; Jayne L. Freeman; JULIE; Lowell\_Williams@wawd.uscourts.gov  
**Subject:** RE: case No. 2:17-cv-00642 RSM

Counsel and Ms. Dalessio,

Please review my e-mail below, which states the Court will no longer entertain informal email requests from you with regard to this matter. We expect the parties to review all documents prior to filing.



Laurie Cuaresma  
Courtroom Deputy to  
Chief Judge Ricardo S. Martinez  
United States District Court  
Western District of Washington  
206-370-8521

**From:** LaHoma Walker <LWalker@kbmlawyers.com>  
**Sent:** "Laurie\_Cuaresma@wawd.uscourts.gov" <Laurie\_Cuaresma@wawd.uscourts.gov>  
**Cc:** "Derek C. Chen" <DChen@kbmlawyers.com>, "Jayne L. Freeman" <JFreeman@kbmlawyers.com>, JULIE <juliedalessio@msn.com>, "Lowell\_Williams@wawd.uscourts.gov" <Lowell\_Williams@wawd.uscourts.gov>  
**Date:** 08/30/2017 02:30 PM  
**Subject:** RE: case No. 2:17-cv-00642 RSM

Good afternoon, Ms. Cuaresma.

Thank you for your continued assistance. We have had another individual in our office independently review the document in question and have redacted all instances of Plaintiff's date of birth and social security number (the only other instance of an SSN we could find was illegible, but we have redacted it just to be safe) we could identify and are ready to re-file it. In addition to Dkt. 30-2, which the Court sealed, we identified redactions in Exhibit A (Dkt. 30-1) of the Swenson Declaration, and have redacted those as well. New versions of Dkts. 30-1 and 30-2 are ready to file.

In an effort to make sure the Court and the parties do not have to repeat these efforts, we would greatly appreciate it if the Court and/or Plaintiff could inform us of any pages where either Plaintiff's SSN or date of birth was not redacted. If we haven't done so already, we would be happy to redact it before re-filing.

Thank you and all the best,

**From:** Laurie\_Cuaresma@wawd.uscourts.gov [mailto:Laurie\_Cuaresma@wawd.uscourts.gov]

Sent: Wednesday, August 30, 2017 10:59 AM

To: LaHoma Walker <LWalker@kbmlawyers.com>

Cc: Derek C. Chen <DChen@kbmlawyers.com>; Jayne L. Freeman <JFreeman@kbmlawyers.com>; JULIE <juliedalessio@msn.com>; Lowell\_Williams@wawd.uscourts.gov

Subject: RE: case No. 2:17-cv-00642 RSM

Counsel and Ms. Dalessio,

In reviewing the documents at issue, the Court had identified several pages that still contained Ms. Dalessio's social security number, as well as her date of birth, which is why they were sealed and why the Court sent the electronic message to Defendant to make further redactions. Once those additional redactions have been made, please re-file a new redacted copy publicly.

Ms. Dalessio, if you believe that the newly redacted documents still contain information that should be further redacted or filed under seal, you may submit a motion to the Court, specifically identifying where the objectionable information is contained, by docket, exhibit and page numbers, and the legal basis for your motion, and the Court will address the matter accordingly. Any such motion to seal must be noted in compliance with the Court's Local Rules. The Court will no longer entertain informal email requests from you with regard to this matter. The Court also notes that Local Civil Rule 5.2, which is accessible on the Court's website, governs the information that must be redacted when filed with the Court.

Regards,



Laurie Cuaresma  
Courtroom Deputy to  
Chief Judge Ricardo S. Martinez  
United States District Court  
Western District of Washington  
206-370-8521

From: LaHoma Walker <LWalker@kbmlawyers.com>

To: "laurie cuaresma@wawd.uscourts.gov" <laurie cuaresma@wawd.uscourts.gov>

Cc: "Derek C. Chen" <DChen@kbmlawyers.com>, "Jayne L. Freeman" <JFreeman@kbmlawyers.com>, "Lowell Williams@wawd.uscourts.gov" <Lowell Williams@wawd.uscourts.gov>, JULIE <juliedalessio@msn.com>

Date: 08/29/2017 01:13 PM

Subject: RE: case No. 2:17-cv-00642 RSM

Ms. Cuaresma,

Since receiving the Court's email yesterday, Defendant has been working with Ms. Dalessio to ensure all dates of birth have been redacted to the year as required by WDLCR 5.2(a). Plaintiff has not identified any additional pages that contain her DOB other than the three that Defendant has found. We are unaware of any rule that permits us to further redact dks. 30-1 or 30-2. Ms. Dalessio clearly still believes there is information that should be redacted, but we do not see a mechanism that would allow us to do so, and she does not identify specifically what she would like redacted. The document is necessary in order for the Court to rule on the merits of the case and will be needed at the appellate level if that ever becomes necessary.

Because Ms. Dalessio decided to email the Court prior to the parties concluding their discussions, Defendant feels the need to respond. We have no problem with dkts. 30-1 and 30-2 (or the newly redacted versions) remaining sealed, as we see no need for this information to be public. However, we do not believe the parties stipulate to this under the court rules. Ms. Dalessio refuses to identify any additional dates of birth she believes Defendant missed, and therefore we have a copy ready to submit with our best attempt at catching all required redactions.

Please let us know if you would like us to: 1) file the newly redacted documents under seal under the Court can make a determination regarding whether they deserve to be under seal, or 2) file the documents with the additional redactions.

Thank you for your time.

Sincerely,

**LaHoma Walker**

Legal Assistant to  
Derek C. Chen  
Jayne L. Freeman  
Kimberly J. Waldbaum  
Michael C. Walter  
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**From:** JULIE [<mailto:juliedalessio@msn.com>]

**Sent:** Tuesday, August 29, 2017 12:50 PM

**To:** [laurie\\_cuaresma@wawd.uscourts.gov](mailto:laurie_cuaresma@wawd.uscourts.gov)

**Cc:** Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>; Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>; [Lowell\\_Williams@wawd.uscourts.gov](mailto:Lowell_Williams@wawd.uscourts.gov)

**Subject:** Re: case No. 2:17-cv-00642 RSM

Dkt. # 30-1 also contains information that should have been redacted, including my date of birth.

julie



**From:** Laurie Cuaresma@wawd.uscourts.gov <Laurie\_Cuaresma@wawd.uscourts.gov>  
**Sent:** Monday, August 28, 2017 10:10:46 AM  
**To:** JULIE  
**Cc:** Derek C. Chen; jfreeman@kbmlawyers.com; LaHoma Walker; Lowell Williams@wawd.uscourts.gov  
**Subject:** Re: case No. 2:17-cv-00642 RSM

Ms. Dalessio,

Thank you for your e-mail. We have reviewed the exhibits and they comport with the e-filing requirements for the most part, but we have discovered that one exhibit contains information that should have been redacted. It will be sealed immediately, and Defendant will be directed to re-file the exhibit with the appropriate redactions.

Regards,



Laurie Cuaresma  
Courtroom Deputy to  
Chief Judge Ricardo S. Martinez  
United States District Court  
Western District of Washington  
206-370-8521

**From:** JULIE <juliedalessio@msn.com>  
**To:** "laurie cuaresma@wawd.uscourts.gov" <laurie\_cuaresma@wawd.uscourts.gov>  
**Cc:** "jfreeman@kbmlawyers.com" <jfreeman@kbmlawyers.com>, "Derek C. Chen" <DChen@kbmlawyers.com>, LaHoma Walker <LWalker@kbmlawyers.com>  
**Date:** 08/27/2017 11:52 AM  
**Subject:** case No. 2:17-cv-00642 RSM

Regarding Dalessio v. University of Washington

The University has moved for dismissal of my claims, to be heard sept 15.

in their filings with the court, they have included the complete set of documents that I have claimed were inappropriately provided to my neighbor, thus **publicly re-disseminating** personal, confidential, and statutorily exempt information including my **date of birth**, personal uw student/alumni email, health information etc, as described in my complaint at page 7.

please let me know how this can be remedied

thank-you  
julie dalessio  
206 324 2590